

JAP:PJB

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C. § 2252(a)(2))

HAKMET OTHMAN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

AMANDA YOUNG, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

In or about and between November 2017 and January 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HAKMET OTHMAN did knowingly receive any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, using any means or facility of interstate or foreign commerce or that has been mailed, or has been shipped or transported in or affecting interstate or foreign commerce or which contains materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(2)).

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with the FBI since March 2017 and am currently assigned to the New York Office. Since October 2017, I have been assigned to a Crimes Against Children squad and have investigated violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through classroom training and daily work conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child pornography cases and have reviewed hundreds of photographs and video files depicting minors (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. Law enforcement observed a BitTorrent network user sharing child pornography from the IP address 24.193.203.95 on or about October 14, 2017 through January 26, 2018. On or about November 8, 2017, an FBI Special Agent working in an undercover capacity (the "Undercover Agent"), used a BitTorrent application via an Internet-connected computer located within the FBI New York Division to conduct undercover

investigations into the Internet distribution and possession of child pornography. During this investigation, a computer that was sharing child pornography was located on the Bittorrent file sharing network. The Undercover Agent downloaded approximately 5,000 files containing child pornography, including toddlers and infants. The sharing client's IP address was recorded along with the date and time of the file transfer. The sharing client reported that it was using Bittorrent client "BT 71000 BitTorrent 7.10." Your Affiant reviewed the files downloaded. Several of these files, which are available for the Court's review, are described as follows:

- a. **0yo-g-07-01.jpg** is an image of an infant being vaginally penetrated by an adult male penis.
- b. **20050601083743r.jpg** is an image of an approximately 1 year old female being orally penetrated by an adult male penis.
- c. **2yrbaby6.jpg** is an image of an approximately 2 year old female being anally penetrated by an adult male penis.
- d. **mvs-863f.jpg** is an image of an approximately 4 year old female being anally penetrated by an adult male penis.
- e. **bdsm 03 bondage girl hmm judyan man pthc sound vaginal.jpg** is an image of a frame by frame video of an approximately 7 year old female with her hands and legs tied to the bed being vaginally penetrated by an adult male penis.
- f. **AdryBlowjob2 (1). MTS.jpg** is an image of a frame by frame video of an approximately 7 year old female performing oral sex on an adult male.

4. The IP address assigned to the computer sharing the above files was

24.193.203.95 on the date referenced above. The Bittorrent application used by the FBI captures the IP address from which the files were sent. All of the above files were downloaded from the IP address 24.193.203.95. When users on this file sharing network

download files, the computers sharing files can be identified by their IP addresses.

Investigators can view and describe the completely downloaded files. Open source database searches revealed the IP address 24.193.203.95 was registered to Time Warner Cable.

5. Records obtained from Time Warner Cable by administrative subpoena showed that on or about November 8, 2017, the IP address 24.193.203.95 was associated with an address in Staten Island (the “Staten Island Address”). The account was listed in the name of the “HAKET OTHMAN.”

6. On January 29, 2018, the Honorable JAMES ORENSTEIN, United States Magistrate Judge, issued a warrant authorizing a search of the Staten Island Address. On January 30, 2018, law enforcement agents executed the search warrant at the Staten Island Address.

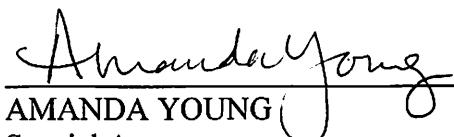
7. The defendant HAKMET OTHMAN was not at the Staten Island Address at the time of the execution of the search warrant. Law enforcement agents participated in a voluntary interview of the defendant at his work. He was advised of the identities of the interviewing agents and the nature of the interview. The defendant was advised that he was not under arrest and that he could discontinue the interview at any time.

8. In sum and substance, the defendant HAKMET OTHMAN confirmed that he resides at the Staten Island Address. He further admitted that he has been receiving and viewing child pornography several years. He admitted to using peer-to-peer file sharing applications to find and receive child pornography.

9. The defendant HAKMET OTHMAN also identified his electronic devices, including a cellular device and a laptop. The defendant admitted that he used the

laptop to find and receive child pornography. Law enforcement agents conducted a preliminary review of the contents of the laptop, which revealed multiple files containing child pornography.

WHEREFORE, your deponent respectfully requests that the defendant HAKMET OTHMAN be dealt with according to law.

  
AMANDA YOUNG  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
30th day of January, 2018

  
THE HONORABLE  
UNITED STATES  
EASTERN DIST.

  
S. Orenstein